

1 RAM, OLSON, CEREGHINO &  
2 KOPCZYNSKI  
3 MICHAEL F. RAM (SBN 104805)  
4 mram@rocklawcal.com  
5 555 Montgomery Street, Suite 820  
6 San Francisco, CA 94111  
7 Telephone: (415) 433-4949  
8 Facsimile: (415) 433-7311  
9 [Additional counsel on signature page]  
10 *Attorneys for Plaintiffs and Proposed Class*

7 MAYER BROWN LLP  
CARMINE R. ZARLENGA (D.C. Bar. No.  
8 286244)  
9 Zarlenga@mayerbrown.com  
10 1999 K Street, N.W.  
Washington, DC 20006-1101  
Telephone: (202) 263-3000  
Facsimile: (202) 263-3300

11 MAYER BROWN LLP  
12 DALE J. GIALI (SBN 150382)  
13 KERI E. BORDERS (SBN 194015)  
14 [dgiali@mayerbrown.com](mailto:dgiali@mayerbrown.com)  
15 [kborders@mayerbrown.com](mailto:kborders@mayerbrown.com)  
350 South Grand Avenue, 25th Floor  
Los Angeles, CA 90071  
Telephone: (213) 229-9500  
Facsimile: (213) 625-0248

16 Attorneys for Defendant  
17 Nestlé Purina PetCare Company

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

21 FRANK LUCIDO, et al, on behalf of himself  
and all others similarly situated,

22 || Plaintiffs.

V.

24 NESTLÉ PURINA PETCARE COMPANY, a  
25 Missouri corporation; and DOES 1 through 200,  
inclusive.

## Defendants

Case No. 4:15-cv-00569-LB

**STIPULATION AND [PROPOSED]  
ORDER CONTINUING THE APRIL 7,  
2016 CASE MANAGEMENT  
CONFERENCE UNTIL APRIL 28, 2016**

1 Plaintiffs Frank Lucido, Almaceo Campbell, Laurae Campbell, Karen Phillips, Wayne  
2 Colello, Ricky Bisharat, Hope Benham, Robin Benham, Virginia Burgardt, Cynthia Xenakis,  
3 Diane Porter, Lance Carlson, Grace Armstrong, Thomas Normand, Sharon Normand, Christina  
4 Winters, Robert Bryden, America Pena, Elizabeth Rodarte, and Kacy Kimball (collectively,  
5 “Plaintiffs”) and defendant Nestlé Purina PetCare Company (“Purina”), by and through their  
6 respective counsel of record, enter into the following stipulation regarding the case management  
7 conference case currently set for April 7, 2016 at 10:30 a.m.

8 WHEREAS, Plaintiffs have noticed depositions, pursuant to Federal Rule of Civil  
9 Procedure 30(b)(6) of Purina that will require the production of four witnesses (the “Purina  
10 Depositions”);

11 WHEREAS, based on the schedules of the Purina witnesses, Plaintiffs’ counsel and  
12 Purina’s counsel, the depositions have been scheduled for April 6-7, 2016 and April 13-14, 2016  
13 in St. Louis, Missouri and those depositions will be attended by lead counsel for both parties;

14 WHEREAS, at the October 8, 2015 case management conference, the Court set a further  
15 case management conference in this case for April 7, 2016 at 10:30 a.m.;

16 WHEREAS, because lead counsel will be attending the Purina depositions in St. Louis,  
17 Missouri on April 6-7, 2016, and it is not feasible to timely reschedule the depositions set for  
18 April 6-7, 2016, the parties seek to continue the case management conference.

19 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, between  
20 Plaintiffs and Purina that:

21 1. The Case Management Conference currently set for April 7, 2016 at 10:30 a.m. should  
22 be continued until April 28, 2016 at 10:30 a.m., or for a later date based on the Court’s calendar  
23 and convenience.

24 Dated: March 14, 2016

RAM, OLSON, CEREGHINO &  
KOPCZYNSKI LLP  
Jeffrey B. Cereghino  
Michael F. Ram  
Matt J. Malone  
Susan Brown

1 MORGAN & MORGAN COMPLEX  
2 LITIGATION GROUP  
3 John Yanchunis  
James Young

4 MERRILL, NOMURA & MOLINEUX  
Karl Molineux

5 KIMBRELL & SOLEN LLC  
Karl Molineux  
Donna F. Solen

6 TERRELL MARSHALL DAUDT & WILLIE  
PLLC  
7 Beth Terrell  
Adrienne Mcntee

8 PASTOR LAW OFFICE, LLP  
9 David Pastor

10 LEONARD LAW OFFICE, PC  
Preston W. Leonard

11 FINKELSTEIN, BLANKINSHIP, FREI-  
PEARSON & GARBER, LLP  
12 Todd Garber  
13 Greg Blankinship

14 CONSUMER LAW GROUP  
Alan Mansfield

15 LACKEY HERSHMAN, L.L.P.  
Roger Mandel

16 PALIARE ROLAND ROSENBERG  
ROTHSTEIN LLP  
17 Denise Sayer  
Odette Soriano  
Margaret Waddell

18 GILMAN LAW LLP  
Kenneth Gilman

19 CUNEO GILBERT & LADUCA, LLLP  
Michael Flannery

20 THE ANIMAL LAW CENTER  
Jennifer R. Edwards

21 THE RICHMAN LAW GROUP  
Kim Richman

22 EDLEMAN, COMBS, LATTURNER &  
GOODWIN, LLC

1 Thomas E. Soule  
2 LAW OFFICES OF S. CHANDLER VISHER  
3 S. Chandler Visher

4 By /s/ Jeffrey B. Cereghino  
5 Jeffrey B. Cereghino  
6 Attorneys for Plaintiffs and Proposed Class

7 Dated: March 14, 2016

8 MAYER BROWN LLP  
9 Carmine R. Zarlenga  
10 Dale J. Giali  
11 Keri E. Borders

12 By: /s/ Keri E. Borders  
13 Keri E. Borders  
14 Attorneys for Defendant Nestlé Purina Petcare  
15 Company

16 **ATTESTATION**

17 I, Keri E. Borders, hereby attest, pursuant to N.D. Cal. Local Rule 5-1(i)(3) that  
18 concurrence to the filing of this document has been obtained from each signatory.

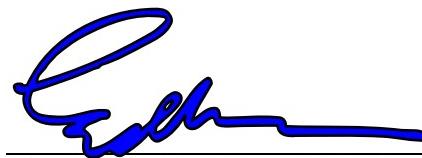
19 By: /s/ Keri E. Borders  
20 Keri E. Borders  
21 Attorneys for Defendant Nestlé Purina Petcare  
22 Company

23 **[PROPOSED] ORDER**

24 Based on the stipulation of the parties, the Case Management Conference is continued  
25 from April 7, 2016 at 10:30 a.m. until May 5, 2016 at 10:30 A.M.

26 IT IS SO ORDERED.

27 Dated: March 14, 2016



The Honorable Edward M. Chen  
Judge, United States District Court